

February 18, 2014 Via ECFS

Ms. Marlene H. Dortch, FCC Secretary Office of the Secretary Federal Communications Commission 445 12th Street, SW, Suite TW-A325 Washington, DC 20554

RE: EB Docket No. 06-36

Annual 64.2009(e) CPNI Certification for Calendar Year 2013 TNCI Operating Company LLC - 499 Filer ID 829775

Dear Ms. Dortch:

Attached for filing is the Calendar Year 2013 CPNI Compliance Certification and Statement of CPNI Procedures and Compliance as required by 47 C.F.R. Section 64.2009 (e) submitted on behalf of TNCI Operating Company LLC.

Any questions you may have concerning this filing may be directed to me at 407-740-3001 or via email to tforte@tminc.com.

Sincerely,

/s/Thomas M. Forte Thomas M. Forte Consultant to TNCI

TF/mp
Attachment

cc: J. Compton - TNCI (via email)

file: TNCI – FCC CPNI tms: FCx1401 CPNI

ANNUAL 47 C.F.R § 64.2009(e) OFFICER'S CERTIFICATION OF CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for:

Calendar Year 2013

Name of Company covered by this certification:

TNCI Operating Company LLC

Form 499 Filer ID:

829775

Name of Signatory:

Jeff Compton

Title of Signatory:

President and CEO

I, Jeff Compton, certify that I am an officer, President and CEO, of TNCI Operating Company LLC, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification, as Exhibit A, is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in § 64.2001 et seq. of the Commission's rules.

The company has not taken any actions (i.e., proceedings instituted or petitions filed by the company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R.§ 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Jeff Compton

President and CEO

2-13-14

Attachments:

Accompanying Statement explaining CPNI procedures-Attachment A

Annual 47 C.F.R. § 64.2010(e) CPNI Certification EB Docket 06-36

Attachment A: Statement Concerning Company Procedures

TNCI Operating Company LLC, ("Company") has established strict policies and procedures, which expressly prohibit release of Customer Proprietary Network Information ("CPNI") to any employee not directly involved in the provision of service to the customer, subject to disciplinary action and termination of employment. Employees that may have access to CPNI receive an initial CPNI protection briefing and annual CPNI protection requirement reviews thereafter. All employees are strictly held to non-disclosure obligations.

CPNI data is accessible only to those employees with a "need to know" for purposes of serving current subscribers. The Company does not sell, or otherwise release, CPNI to other entities under any circumstances. All contact with customers is documented through retention of electronic copies of communications and retention of any scripts used if contacting subscribers telephonically, for a minimum period of one year. All sales or marketing campaigns initiated by the Company require approval of the officer responsible for ensuring that each campaign strictly complies with the Commission's CPNI regulations.

In calendar year 2013, the Company took no action against data brokers. In calendar year 2013, the Company received no consumer complaints regarding CPNI issues.